

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|--------------------------------|---|---------------------------------|
| MADELINE KANE, <i>et al.</i> , |) | |
| |) | |
| Plaintiffs, |) | Lead Case No. 22-cv-06476 |
| |) | Related Case Nos.: 23-cv-02772; |
| v. |) | 24-cv-08223 |
| |) | |
| |) | Honorable Jeremy C. Daniel |
| LOYOLA UNIVERSITY OF CHICAGO, |) | Honorable Heather K. McShain |
| |) | |
| Defendant. |) | |

JOINT MOTION FOR ENTRY OF AMENDED CONFIDENTIALITY ORDER

Plaintiffs MADELINE KANE, ET AL., and Defendant LOYOLA UNIVERSITY OF CHICAGO (collectively referred to as the “Parties”) jointly move for the entry of an Agreed Amended Confidentiality Order. In support thereof the parties state as follows:

1. On December 16, 2024, the Parties moved to enter an Agreed Confidentiality Order in order to exchange confidential information relevant to the issues in this litigation. (Dkt No. 105).
2. On December 18, 2024, the Court entered the Parties’ Agreed Confidentiality Order. (Dkt. No. 108).
3. The parties now seek to exchange student educational records protected by the Family Educational Rights and Privacy Act of 1974 (“FERPA”) and seek to amend the Agreed Confidentiality Order to ensure those records are appropriately safeguarded pursuant to FERPA’s requirements.

WHEREFORE, the parties respectfully request that this Court enter the Agreed Amended Confidentiality Order in the form provided to the Court via its proposed order email.

Dated: August 13, 2025

RESPECTFULLY SUBMITTED,

MADELINE KANE, ET AL.,

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CERTIFICATE OF SERVICE

I hereby certify that, on August 13, 2025, a copy of the foregoing Motion was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ Kirsten A. Milton